

)	United States District Court
JoAnn Piphus)	Northern District of Illinois
William Piphus, et al)	
Plaintiffs)	
v.)	
City Of Chicago of)	1:12-cv-07259
Chicago Police Department,)	Judge Judge John F. Grady
Rahm Emanuel, Mayor)	Magistrate Judge Jeffrey T. Gilbert
Garry F McCarthy)	
Officer Karyn Gross)	Demand for Jury Trial
Officer Valdez,)	
Officer Dennis Brown)	
Detective Little)	
Sergeant Yvonne Terry)	
Defendants)	

Complaint

RECEIVED

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9-11-12 ea
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

I. Jurisdiction and Venue

- 1.) **Plaintiffs believe this court has venue for this case in pursuant to:**
- 2.) **A.) Procedural Due Process.....14th Amendment; 435 US §247,**
42 USC §§1983, 1985((3) and 1986
- 3.) **B.) Freedom of Expression1st, 4th, 5th and 14th Amendment**
- 4.) **C.) Equal/ Civil Rights...4th, 5th, 8th, 18 USC § 241, 242, 245, 28 USC § 1343**
42 USC §1981
- 5.) **D.) The Causes of Action the Plaintiffs alleged are the facts from**
allegations occurring in this Northern District of Illinois.

1 **6.) E.) All Parties in this petition resides inside the State of Illinois**

2 **7.) F.) The amount of this controversy is over \$75,000.**

3
4
5 **II. Introduction**

6 **8.) This action arises under the First, Fourth, Fifth, Eighth and Fourteenth**
7
8 **Amendments to the United States Constitution; under federal law, specifically, 42**
9 **U.S.C. §§ 247, 1983, 1985 (3) and 1986, 18 USC§ 241, 28 USC§ 1343 under Federal**
10 **and State Laws for intentional and/or negligent infliction of emotional distress ,**
11 **negligence, negligent supervision, gross negligence, false imprisonment, false arrest,**
12 **failure to implement policy, customs and practices, and civil conspiracy.**

13
14
15 **While the individual Defendants were acting in the scope of their employment and**
16 **under color of state law, defendants made an unlawful interrogation, arrest of Plaintiff**
17 **(minor "Pxx") that resulted in false arrest, false imprisonment and false prosecution,**
18 **intimidation against the Plaintiff (s) "Pxx". The Defendants' actions caused injury**
19 **severe emotional distress to Plaintiffs.**

20
21
22 **Action is also brought against the City of Chicago for its failure to properly train and**
23 **supervise the individual Defendants in the proper use of procedures, proper dispatch**
24 **policy, and its establishment of policies, procedures, practices, and customs regarding**
25 **arrest when dealing with juveniles in a school setting.**

III. Parties

A.) Plaintiffs:

- 9.) **JoAnn Piphus, Chicago, Illinois is Parent of "Pxx".**
- 10.) **William Piphus, Chicago, Illinois is Parent of "Pxx".**
- 11.) **Pxx (minor), Chicago, Illinois**

B.) Defendants:

- 12.) **Rahm Emanuel, Mayor – City of Chicago**
- 13.) **Garry F McCarthy, Superintendent –Chicago Police Department**
- 14.) **Police Officer Karyn Gross, Chicago Police Department**
- 15.) **Police Officer Valdez, Chicago Police Department**
- 16.) **Police Officer Dennis Brown, Chicago Police Department**
- 17.) **Detective Little, Chicago Police Department**
- 18.) **Police Officer Sergeant Yvonne Terry, Chicago Police Department**

IV. Facts:

- 19.) On Monday, March 26, 2012, strangers walked into King College Prep High School located at 4445 S. Drexel, Chicago., IL. from off the street.
- 20.) The strangers made allegations that a student from the school (Plaintiff "Pxx") had assaulted their (child) at a party on the previous Saturday night, March 24, 2012 at Leo High (A Private High School) located at 7901 S. Sangamon, Chicago, Ill.,

1 and they wanted to press charges.

2 21.) The adults stated they had the evidences because on his/her (Plaintiff "Pxx")
3
4 Twitter's page he/she stated, "we beat that girl down" and had "taken pictures" of
5 their (child) " blood" on the gymnasium's floor and posted on the page."

6 22.) The school, allowed Officer Gross, to go and remove "Pxx" from classroom
7
8 without notifying parents and without Chicago Public School personnel being present.

9 23.) Officer Gross and Officer Valdez interrogated Plaintiff without placing a call to
10
11 the parents and without Chicago Public School personnel being present.

12 24.) "Pxx" asked to call her parents and was denied by Officers Gross and Valdez,
13
14 knowing that the accusers entered the school to press charges upon "Pxx".

15 25.) Mr. and Mrs. Piphus received a call from the school (Ms. Khan Assistant
16
17 Principal) regarding pornography on Twitter Page, after ten minutes of discussing this
18 issue she stated that someone wanted to press charges against "Pxx".

19 26.) Mr. and Mrs. Piphus rushed up to the school only to find out that "Pxx" had
20
21 been and still was being interrogated by Officer Gross and Officer Valdez.

22 27.) Ms. Khan took us to see Officer Gross in her assigned space within the school.

23 28.) Officer Gross explained that the parents wanted to press assault charges.

24 29.) Officer Gross (Officer Valdez was also present) brought all parties (parents and
25
26 minor-accusers) Mr. and Mrs. Piphus and Minor "Pxx" into the room.

1 30.) In the presence of all parties the minor accuser stated that she did not see "Pxx"
2 hit or kick her, but she saw her face while looking up from the ground (outside Leo
3 High- party cancelled and everyone put out of gymnasium) as she was beaten.

4
5 31.) Officer Gross explained that "Pxx" was being charged because on her Twitter
6 page she stated that "we beat that girl good" (never stating a name). (There were more
7 than five fights at Leo High School) Joanna explained that she was trash talking to get
8 more followers to come to her twitter account and to not look like a lame. Officer
9 Gross said, because she had "taken pictures" of blood from gymnasium's at Leo High
10 School's floor (later proven pictures came from others Twitter account) and the
11 statements she made on her web site -- "she is guilty".
12
13
14

15 32.) Officer Gross asked the parents "do you still want to press charges" and
16 the parents stated "Yes."

17
18 33.) Officer Gross then told Mr./ Mrs. Piphus and "Pxx" to leave the room so that
19 she could take the statement with accusers and file charges pending the arrest of "Pxx".

20 34.) Officer Gross called us back in the room after the accusers had left and told us
21 that "she was going to do us a favor" by not arresting "Pxx" on Monday, March 26,
22 2012.
23

24 35.) Officer Gross told us to go home and "not allow "Pxx" to come to school and
25 wait until Tuesday March 27, 2012, to wait at home until she calls," then
26
27
28

1 bring "Pxx" up to the school to be arrested.

2 36.) On Tuesday, March 27, 2012 at approximately 10:00 am, Mr./ Mrs. Piphus
3 received a phone call from Officer Brown and was instructed to bring "Pxx" to school
4 for the arrest.
5

6 37.) At approximately 11:00 am we arrived at King College Prep for the arrest out of
7 fear that if we did not, things would be worse for "Pxx".
8

9 38.) Mr. / Mrs. Piphus tried to reason with Officer Gross regarding "Pxx" being
10 railroaded into the arrest, whereas Officer Gross became upset and stated that she
11 could make things worse by sending her to juvenile court which would drag out the
12 process and require a lawyer to get "Pxx" out of Juvenile Court.
13

14 39.) Officer Gross repeatedly, in the presence of Officer Brown told "Pxx" to
15 state the name of her "Twitter" account, "Chubby Baby; sub title Kiss My Pink Box",
16 to further humiliate "Pxx."
17

18 40.) Officer Gross then told Mr./ Mrs. Piphus to leave the building, go home or to the
19 Juvenile Intervention and Support Center (JICS), located at 3900 S. California Avenue
20 and wait for her to call, while she had "Pxx" processed (arrested).
21

22 41.) Officer Gross "expressively" instructed Mr./ Mrs. to wait in the parking lot at
23 the juvenile center and "that we could not wait in the building."
24

25 42.) At no time in Mr. / Mrs. Piphus presence did Officer Gross nor did Officer Brown
26

1
2 read "Pxx" her Miranda Rights.

3
4 43.) After two hours, Mr. / Mrs. Piphus received a call from Officer Gross stating that
5 we could pick her up at the Juvenile Center on 39th and California.

6
7 44.) Detective Little, who issued the Informal Juvenile Adjustment, with no signatures
8 or Miranda Rights checked on form, explained that the case against "Pxx" "was weak
9 due to accuser changing her story, and that Officer Gross had lost her mother and was
10 probably having a bad day."

11
12 45.) After picking "Pxx" from the center, Mr./ Mrs. Piphus asked her if either Officer
13 Gross or Officer Brown, the transport Officers or Police Officer who placed her in
14 handcuffs, or Detective Little (Juvenile Center) or any Police Officer had read the
15 Miranda rights and "Pxx" response was "No".

16
17 46.) From that point until today "Pxx" has nightmares and feels that after telling the
18 truth to Officer Gross and not being the one who assaulted the accuser that Police
19 Officers in the City of Chicago cannot be trusted and her parents can no longer protect
20 "Pxx".

21
22
23 47.) "Pxx and Mr./ Mrs. Piphus feels the humiliation of the false arrest in front of "P"s
24 peers, handcuffed, charged and found guilty all within a twenty-four period to be cruel
25 and unusual punishment.
26

A.) "Pxx" Profile (See Exhibit 1 Profile):

B.) Arrest Report (See Exhibit 2)

48.) Action is brought against the City of Chicago: Chicago Police Department for its failure to properly train and supervise the individual Defendants in the proper use of techniques used when dealing with minors in their care, to properly dispatch policy, failure to follow established policies, procedures, practices, and customs regarding arrests that result in minors being charged with a crime within the City of Chicago.

49.) Plaintiffs charges further that the City of Chicago of failure to discipline train and control its Police Officers in the line of duty.

50.) Defendant City of Chicago is a municipal corporation, duly incorporated under the laws of the State of Illinois, and the employer and principal of Defendants at the time of incident.

51.) We, the parents and Plaintiffs of minor "Pxx" believe that gross negligence occurred before, during and after the arrest of "Pxx"; reasonable care was not provided thereby causing irreparable injury whether intentional and/or negligent, infliction of emotional distress, conversion, negligence, absent of customs, negligent supervision, gross negligence, including false imprisonment and/or false arrest and /or unlawful arrest, malicious prosecution and civil conspiracy to the plaintiffs.

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2 52.) Plaintiffs allege Defendants' misconduct and improper treatment in applying
3 the law caused injuries to the Plaintiffs.
4

5 53.) Therefore, the Plaintiffs come before these courts humble with a plea for legal
6 justice.
7

8 54.) The Plaintiff believes and is informed that our rights are protected under the law
9 and enforceable by the law, without reservations.

10 55.) Our pleas to the defendants that the actions that were being taken, at the time,
11 against minor "Pxx" were erroneous and unlawful;
12

13 56.) Worse yet, Plaintiffs allege the Defendants ignored their pleas for legal justice
14 and willfully proceeded in violating the rights of "Pxx" and the parents were under
15 threat of - that even greater harm would prevail if we did not go along with the
16 Defendants' course of actions; (See Exhibit 2). Police Report
17
18

19 57.) Further, we the Plaintiffs initially asked the defendants at time of incident (under
20 date of incident):
21

22 "What were the current established procedures to address –when
23 a stranger walks into a school from off the street and states that
24 a student has violated the law, the allege act happened off campus
25 and wants to press charges against a student?"
26

1 58.) The Plaintiffs allege that the Defendants evasiveness to provide an answer
2 cannot be simply ignored and the application of the *gray area* cannot be explained to
3 fit, nor be applied.
4

5 59.) Plaintiffs allege if there is no Standard Operating Procedure in place,
6 then the existing law must be supreme and takes on precedent as the applicable law to
7 engage this incident, "Pxx"; the application of law must be:
8

9 **To Protect the Minor (First)**
10

11 60.) The Plaintiffs allege and asked, "What other rights do juveniles have when they
12 are under arrest or before being interrogated about the alleged offense?"
13

14 61.) Chicago Police Officers Defendants did not follow the law or establish
15 procedures regarding minors as established under the Illinois Juvenile Justice System,
16 thereby not proceeding with the application of due process and providing equal
17 protection to "Pxx" as prescribed by law for a protected group; the causable action was
18 further irreparable injuries to the Plaintiffs.
19

20 62.) We the Plaintiffs charge that the City of Chicago, Rahm Emanuel as Mayor,
21 through its agency and management, mainly the Chicago Police Department with the
22 leadership of Garry F. McCarthy, Superintendent, Chicago City Council as Governing
23 Board, its Officers, Administrators and employees with powers of control must be held
24 accountable for their actions that violate or break the law.
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2 63.) As a direct and proximate result of the intentional and/or negligent acts of
3 Defendants, Plaintiffs sustained severe mental pain; and suffering; and injury in an
4 amount that will be established at trial.
5

6 64.) Plaintiffs are entitled to compensation for the constitutional harm that all
7 Defendants, City of Chicago and the specified Officers of the Chicago Police
8 Department intentionally inflicted harm upon Plaintiffs, including severe injuries.
9
10

11 12 **V. Causes of Actions**

13 **COUNT I**

14 15 **Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983**

16 **(General Allegations)**

17 64.) *Plaintiffs re-allege and by referencing to the allegations in paragraphs 1-64 of*
18 *this Complaint.*

19 65.) In committing the acts in the complaint, Defendants acted under color of state
20 law to deprive Plaintiffs of certain constitutionally protected rights under the First,
21 Fourth, Fifth, Eighth and Fourteenth Amendments to the Constitution of the United
22 States including, but not limited to: a) the right of freedom of speech and freedom of
23 expressions; b) the right not to be deprived of liberty without due process of law; c) the
24 right of innocent until proven guilty under due process of the law; d) the right to be
25 free from false arrest, false imprisonment, intimidation, and false prosecution by
26 persons acting under color of state law.
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1
2 66.) In violating Plaintiffs' rights as stated above, defendants acted under color of
3 state law and conducted an unauthorized, warrantless arrest of Plaintiff "Pxx". The
4 illegal and warrantless arrest set in motion the violation of Plaintiffs' rights under the
5 First, Fourth, Fifth, Eighth and Fourteenth Amendments of the Constitution.

6 67.) The conduct of Defendants was willful, malicious, oppressive and/or reckless,
7 and was of such a nature that punitive damages should be imposed in an amount
8 commensurate with the wrongful acts alleged by Plaintiff's.

9 68.) As a direct and result of the violation of Plaintiff's constitutional rights by the
10 Defendants, Plaintiffs suffered general and special damages as alleged in this
11 Complaint and are entitled to relief under 42 U.S.C §1983.
12

13
14 **Count II**

15 **Violation of Civil Rights Pursuant to Title 14th Amendment; 435 US§§247**

16 **(Procedural Due Process)**

17 69.) *Plaintiffs re-allege by reference the allegations in paragraphs 1-64 of this*
18 *Complaint.*

19 70.) Plaintiffs allege that Officer Gross, by removing parents during arrest, failed in
20 her duties, by not reading plaintiff(s) Miranda rights as required by law thereby failing
21 the very basic standard procedural due process.

22 71.) Defendant Gross, in concert with the other Defendants at the scene,
23 intentionally violated the civil rights of the Plaintiffs by her malicious and wanton
24 disregard for Plaintiffs' protected rights.

25 72.) The conduct of Officer Gross and the other Defendants, under the color of law,
26 either with the specific intent to violate the Plaintiffs' civil rights or with a reckless
27

1 disregard of the probability of facts for innocent or truth caused severe emotional
2 distress to the Plaintiffs, and Plaintiffs are entitled to compensatory and punitive
3 damages.

4 **Count III**

5 **Violation of Civil Rights Pursuant to Title 18, U.S.C., Section 241, 42 USC 1983**
6 **(Civil Conspiracy)**
7

8 73.) *Plaintiffs re-allege by referencing the allegations in paragraphs 1-64 of this*
9 *Complaint.*

10 74.) The Plaintiffs allege City of Chicago with its duly sworn Police Officer Gross,
11 Police Officer Valdez, Police Officer Brown, Detective Little, Officer Evonne Terry,
12 each and as a group conspired in the execution of their official duties, used actions that
13 caused plaintiffs irreparable injuries, while each had the power to prevent harm, under
14 customs or by procedures or by law.

15 75.) Plaintiffs alleged that Sergeant Terry, as Supervisor of Officer Gross, by being
16 informed, harmed and inflicted pain and suffering by only taking the allegations of
17 violation of due process seriously, only after a complaint was filed with the
18 Independent Police Review Authority, thereby previously conspiring with other
19 defendants' parties fortified the injuries to plaintiffs.
20

21 76.) Plaintiff allege Officer Valdez's, under the color of law, pivotal position was
22 silence and only to respond to restrain plaintiff (Mr. Piphus) when plaintiff asked
23 questions or when sought the facts, thereby causing the plaintiff emotional harm by
24 being unable to defend nor protect his family from this type of onslaught of injustice.

25 77.) The Plaintiffs are charging Defendant Dennis Brown, Patrol Officer under the
26 color of law and principal under the City of Chicago conspired by being informed,
27
28

1 heard and saw fellow Officer Gross misconduct and intent, had the legal power to
2 prevent causable harm, but rather knowingly affixed his signature as testimony on
3 arrest report without any knowledge of what transpired the previous day; he was not
4 present on Monday March 26, 2012, date of incident.

5 78.) The Plaintiffs are alleging that through the "code of silence", the Chicago
6 Police Department has conspired to deny Plaintiffs a copy of the report from Officers
7 Gross and Brown by giving Plaintiffs a copy of the original police report which does
8 not have Officers Gross nor Officer Brown name attached, or any documentation of
9 the incident, interrogation and other facts, even though the arrest was initiated by the
10 Defendants and as a result continued to harm Plaintiffs.

11 79.) The Defendants present or actions involving aforementioned incident
12 participated in a common design through a concert of action to protect fellow
13 Officer Gross, by making overtly false statements in their reports regarding the
14 circumstances surrounding the Plaintiff "Pxx's" incident.

15 80). In committing the aforementioned acts, each Defendant directly and proximately
16 injured, damaged, libeled, and caused emotional distress to the Plaintiffs.

17 Count IV

18 **Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983** 19 **(Failure to Implement Appropriate Policies, Customs and Practices)**

20
21 81.) *Plaintiffs re-allege by referencing the allegations in paragraphs 1-64 of this*
22 *Complaint.*

23 82.) Plaintiffs alleged that the City of Chicago, with its Mayor, has a duty, vision and
24 contingency to ensure that the rights of minors, in the care of the Chicago Police
25 Department with Police Officers, under the leadership of Garry F McCarthy on Public
26 School grounds should have created a concise and specific set of rules, policies and
27

1
2 tactical agenda regarding strangers entering the school to press charges against a
3 Chicago Public School student.

4 83.) Plaintiffs allege that the City of Chicago, by allowing Police Officers to be
5 placed within the Chicago Public Schools, have created a Police State within the
6 schools, which is not governed by any prescription of the laws or bona fide judicial
7 prudence as governance and no true ramification for actions lawfully; The absent of
8 transparent policies and the lack evenly applied controls has caused severe long term
9 emotional distress to the Plaintiffs, and Plaintiffs are entitled to compensatory and
10 punitive damages.

11
12 **Count V**

13 **Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983**
14 **(False Arrest)**

15 84.) *Plaintiffs re-allege by referencing the allegations in paragraphs 1-64 of this*
16 *Complaint.*

17 85.) Plaintiffs allege and charge that Officer Gross causable actions were to falsely
18 imprison, intimidate, improperly detained, humiliate and to harm Plaintiffs.

19 86.) Plaintiffs allege that Defendant Gross had falsely imprisoned and improperly
20 detained with a deliberate indifferent for the truth, for the rights or protection of
21 Plaintiffs and the application of law by disregarding the accusers' statement "I never
22 saw Plaintiff "Pxx" kick or hit me", in the presence of
23 parents, Mr. and Mrs. Hudson, in the presence of plaintiffs , and Officer Valdez.

24 87.) In committing the acts stated in complaint, Defendant Officers Gross, Valdez
25 and Brown acted under color of state law by falsely arresting and detaining the
26 Plaintiffs with no basis in fact or law to do so.

1
2 88.) In violating Plaintiffs' right to be free from false arrest, the Defendants violated
3 Plaintiffs' rights under the Fourth, Fifth, Eighth and Fourteenth Amendments to the
4 Constitution of the United States.

5 89.) As a direct and proximate result of the violation of Plaintiff's constitutional right
6 to be free from false arrest by the Defendants, Plaintiffs suffered serious personal
7 injuries and special damages as alleged in this Complaint and are entitled to relief
8 under 42 U.S.C. §1983.
9

10
11 **Count VI**

12 **Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983**
13 **(False Imprisonment)**

14 90.) *Plaintiffs re-allege by referencing the allegations set forth in paragraphs 1-64 of*
15 *this Complaint.*

16 91.) Plaintiffs allege and charge that Defendants causable actions were to falsely
17 imprison, intimidate, improperly detained, humiliate and to harm Plaintiffs.

18 92.) Plaintiffs allege that Officer Gross, with full knowledge that the Hudson's
19 (parents of accuser) were there at King College Prep to file charges, did not follow the
20 laws regarding the interrogation and arrest of minor as stated by the Illinois Juvenile
21 Justice System.

22 93.) As a direct and proximate result of the false imprisonment by the Defendants,
23 Plaintiffs suffered serious mental injuries and long-term severe emotional distress.

24 94.) Plaintiffs charge that the Defendants are liable to the Plaintiffs for false
25 imprisonment.
26

Count VII

**Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983
(Gross Negligence)**

95.) *Plaintiffs re-allege by referencing the allegations set forth in paragraphs 1-64 of this Complaint.*

96.) Plaintiffs allege that Defendants had falsely imprisoned and improperly detained with a deliberate indifference for the truth, for the rights or protection of Plaintiffs and the application of law by disregarding the accusers' statement "I never saw Plaintiff "Pxx" kick or hit me", in the presence of her parents, Mr. and Mrs. Hudson, in the presence of plaintiffs , and Officer Valdez.

Count VIII

**Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983
(Negligence)**

97.) *Plaintiffs re-allege by referencing the allegations set forth in paragraphs 1-64 of this Complaint.*

98.) Plaintiffs allege that Officer Gross allowed the parents of the accuser to dictate police policy by asking them if they wanted to press charges even though the accuser, their daughter said she did not see Plaintiff hit or kick her in the presence of Plaintiff and Officer Valdez and Mr/Ms Piphus.

99.) Each Defendant owed Plaintiffs a legal duty to use due care or the duty to prevent aforementioned incident.

100). In committing the acts, each Defendant negligently breached their duty to use due care, which resulted in the injuries and damages to the Plaintiffs.

Count IX

Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983

(Supervisor Negligence)

101.) *Plaintiffs re-allege and incorporate herein by reference the allegations set forth in paragraphs 1-64 of this Complaint.*

102.) The Plaintiffs are charging that Detective Little, under the color of law and principal under the City of Chicago by conspiring after being informed, did not perform her duties by dismissing the charges filed by fellow Officer Gross, and having the legal power to prevent causable injuries, but rather knowingly issued to plaintiff an incomplete and unsigned informal adjustment with no signatures as well as not reading or stating Miranda rights to Plaintiff "Pxx".

103.) In committing the aforementioned acts or omissions, each Defendant negligently breached said duty to use due care, which directly resulted in the injuries and damages to Plaintiffs as alleged.

Count X

Violation of Civil Rights Pursuant to Title 42 U.S.C. §§1983, 1981

(Emotional Distress)

104.) *Plaintiffs re-allege by referencing the allegations set forth in paragraphs 1-64 of this Complaint.*

105.) Plaintiffs allege that Officer Gross humiliated and harmed plaintiffs by requesting that we bring Plaintiff "Pxx" back to King College Prep, during school hours, the following day, to be arrested (which Plaintiffs complied out of fear that additional harm would come), while telling parents to vacate the school premises to

1 await a phone call, not to go to Juvenile Intervention and Support Center (JICS) , if
2 we went to the center sit to outside in the parking lot and wait for call at the same time
3 telling Plaintiffs that she (Officer Gross) could make things worse by giving her to the
4 Juvenile Court System if we continued to complain about the arrest of Plaintiff "Pxx."
5 106.) If it so warranted an arrest, Plaintiffs were seeking an opportunity for
6 common decency to delivery "Pxx" to the juvenile detention center as responsible
7 parents and not in the harmful way in which defendants demanded.

8 107.) Plaintiffs allege that after thoroughly questioning Plaintiff "Pxx", with no
9 parent, and no Chicago Public School employee present, and gathering all
10 necessary details about the alleged incident at Leo High School regarding who actually
11 attacked the Hudson's daughter, Officer Gross, further humiliated and harmed Plaintiff
12 "Pxx" by allowing the real attackers to not be charged or questioned and prematurely
13 halting an otherwise ongoing or active investigation into revealing true perpetrators.

14 108.) Plaintiffs allege and charge that Defendant Gross actions were to deliver brutal
15 mental suffering, fear and shame to Plaintiffs and show omnipotent powers of her job
16 as a Chicago Police Officer, which was hurtful and caused irreparable injury to
17 Plaintiffs' "Pxx" respect of authority for the Chicago Police Department.

18 109.) In committing acts each Defendant negligently breached their duty by the
19 intentional inflection of emotional distress, which directly resulted in more severe
20 emotional distress injuries to Plaintiffs as alleged.
21

22 **Prayer for Relief**

23
24 A.) The Plaintiffs pray that all records with regard "Pxx"s arrest, be expunged or
25 destroyed so by the order of the court.
26

1 B.) The Plaintiffs are requesting that as a result this attack on Plaintiff's "Pxx"'s
2 present and future well being, that a full college scholarship fund be constructed by the
3 defendants, on behalf of "Pxx", to help underline and drive "Pxx" innocence request
4 toward future success.

5 **Damages:**

6 1.) We are asking the court for amount of controversy to be 2.5
7 million dollars (Protected) in relief as result of the devastating
8 impact and to measure or correct past, present and future behavior.

9 2.) Plaintiffs are asking for the relief for restitution of
10 administrative costs and any and all associate costs in
11 relationship to this petition.

12 3.) The Plaintiffs are asking that any findings or matters of facts or
13 matters of law be incorporated in this petition for and as relief.

14 4.) The Plaintiffs are asking all severe medical be provide rather past,
15 present or future.

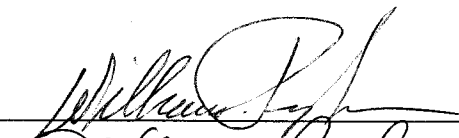
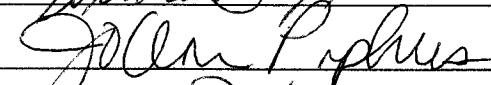
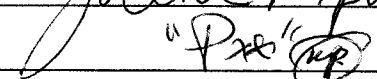
16 D.) Finally, the Plaintiffs allege and are informed that Defendants and
17 counsels may come and answer with a motion to dismiss, under the disguise of
18 pretentious intent or with faults within this pleading; and the response is simply
19 that the plaintiffs sworn no absolute expertise of law, but without help
20 come humbly before the court seeking only real justice.

21 E.) We, the plaintiffs argue for judicial prudence of the court and not
22 allow motion, but rather to allow the plaintiffs to be heard, for the court to
23 correctly balance the letter of the law and speak law facts with volume.

24 F.) A jury for the trial of this matter.

1 We, the plaintiffs have petitioned this court with the truthfulness of facts against
2 defined and charged Defendants; our allegations are serious and our harm is real; and
3 we place mercy, prayer and with God Speed that judgment is favorable and final.
4

5 **Therefore, the Plaintiffs affix their signatures to this petition**
6 **without reservations and with good faith:**

7
8 1.)  dated 9/11/2012
9 2.)  dated 9-11-2012
10 3.)  dated 9/11/2012
11

12 William Piphus and JoAnn Piphus

13 7624 S. Lafayette Chicago, Illinois 60620

14 773-483-0335
15
16
17

18 55.) **Concludes.**

19 Page 21
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EXHIBIT 1

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Profile

“Pxx”

As the Parent’s of Joanna Piphus, we have attempted to develop a positive and righteousness of character to define our daughter. We have, over the last fifteen years, worked continuously to instill the positive values of right/ wrong, family and God. Our grand strategy for our daughter’s future was to craft an academic scholar to measure both our knowledge and over the objections of our own limitations to allow her to have the tools of chance for the many possibilities in life. Thus, we firmly believed, quite possible, through academic excellence. From the time of kindergarten to high school, straight A and Valedictorian, we have carefully measured and controlled a positive path and will continue to do so.

To highlight this commitment and achievement, we are presenting a recent school’s project assignment completed by Joanna on “Employment and Resume Building” to profile Joanna and who she really is and the milestones purported.

This is what this incident is attempting to take away or
destroy and is as follows:

Resume

Joanna Piphus

7624 South Lafayette

Chicago, Illinois 60620

Phone: 1773-483-0335

Young.scholar@yahoo.com

Professional Objective: To Become a Science College Professor

Work History

- Studying
- Completing Assignments
- Home Chores

Education:

High School Current GPA 3.71

Class Rank 23 /271 Percent: .08

08/-09-06/11 University Of Chicago Charter School

Graduate: Diploma June 10, 2011

**** Valedictorian****

Turner Drew Language Academy
Arthur Dixon Elementary School

August 2008 - June 2009
September 2003 - June 2008

Activities:

- Volleyball
- Swimming
- Media Club
- Yearbook
- Track

Interests:

- Graphic Design
- Science/Technology
- Salem Youth Ministry

Experience:

Word Processing: I can utilize Microsoft Word, Microsoft Excel, and Powel Point.

1 Photoshop: I design pictures and posters using Photoshop for family, friend, and events.

2 Community Service: I passed out food at Evangelic Ministry Church and participated in the Chicago
3 Food Depository Walk for Hunger

4 **Achievements:**

5 **Certificates:**

6 2012 Second Place Winner in City of Chicago - *Black History Month Essay Competition 2012: King College*
7 *Prep High School. Sponsors: American Bottling Group, Roosevelt University and Chicago Public Schools CPS*
8 *Rewards: Plaque, camera and photo printer*

9 2011 Completion: Awarded University of Chicago Charter School - *Diploma * June 2011
10 Plaque: **Valedictorian ** University of Chicago Woodlawn 2011

11 2010 PRESIDENT'S EDUCATION AWARDS PROGRAM - PRESIDENT'S AWARD FOR EDUCATOINAL
12 EXCELLENCE "In recognition of OUTSTANDING ACADEMIC EXCELLENCES" notes: 8th Grade (Gold)
13 Accompany Metals...

- 14 • University of Chicago Torch Awards Medal
- 15 • University of Chicago A Honor Roll Awards Medal

16 2010/ PRESIDENT'S EDUCATION AWARDS PROGRAM - PRESIDENT'S AWARD FOR EDUCATOINAL
17 EXCELLENCE

18 2009 "In recognition of OUTSTANDING ACADEMIC EXCELLENCES" notes: 7th Grade (Silver)

19 **Accompanying Metals:**

- 20 • University of Chicago Torch Medal 2010-2009 T2
- 21 • University of Chicago Torch Medal 2010-2009 T3
- 22 • Principal Scholar Honor Roll Medal 2010-2009 T1
- 23 • Principal Scholar Honor Roll Medal 2010-2009 T2
- 24 • Principal Scholar Honor Roll Medal 2010-2009 T3
- 25 • Science Fair Medal of Achievement 2009

26 2010 CHICAGO PUBLIC SCHOOLS – STUDENT SCIENCE FAIR INC.

27 "PRESENTS THIS CITATION – IN RECOGNITON OF SCIENTIFIC ABILITY AND PERFORMANCE: WATERWHEEL
28 PADDLE"

29 **ACCOMPANYING:**

- 30 • Ribbon of Excellence

31 **Dixon Elementary School**

32 **Certificates:**

- 33 • Science Fair Achievement Certificate 2008
- 34 • Honor Roll Certificate 2008
- 35 • Perfect Award Certificate 2008
- 36 • Certificate Service Award "Pennies for Patients Campaign" 2008

- Perfect Attendance 2007
- Bestowed Science Achievement Certificate 2007
- Principal's Award of Outstanding Achievement 2007
- Engineer Science Certificate 2006
- Haiku Festival 2006 Recognition Certificate 2006
for Poetry written by Joanna Piphus
- Principal's Award of Outstanding Achievement 2006
- Outstanding Student of Month Certificate 2006/2005
- Principal's Award of Outstanding Achievement 2005
- Honor Roll "A" Certificate 2005
- Certificate of Citizenship - Student of the Year 2005
- Honor Roll Certificate 2004

Trophies

- Honor Roll 3rd Marking Period 2007-2006
- Principal's Award Academic Achievement 2007-2008
- Science Fair 1st Place 2007-2008
- Science Fair 3rd Place 2005-2006
- DES Perfect Attendant Award 2007-2008
- Honor Roll 4th marking period 2004-2005
- Principal's Award "A" Honor Roll 2006-2007
- DES 3rd marking "A" Honor 2007-2008
- Certificate for Perfect Attendances 2005-2006
- Principal's Apple Achievement Award 2006-2007

Medals

- Flaming Achievement Medal 2003-2004
- Science Fair Achievement Medal 2008-2009
- Reaching for the Stars Medal 2005-2006
- Drum Corps Medal 2007-2008
- Citizens Medal 2007-2008
- "A" Honor Roll Medal 2007-2008
- Music Mastery Medal 2006-2007
- Genie Achievement Medal 2004-2005
- Honor Roll Medal 2003-2004

Plaques

- Science Fair 1st Place 2007-2008
- Special Recognition – Achievement 2003-2004
- Special Recognition – Achievement 2004 -2005
- 3rd Place Science Fair 2005- 2006

- Principal's Apple Award 2004 -2005

Ribbons

- 1st Place Volleyball 2007-2008
- 2nd Place Relay 2005-2006
- 1st Place Relay 2005-2006
- 1st Place Relay 2005-2006
- 4th Place Relay 2005-2006
- 3rd PLACE DES Science Fair 2005-2006

Tuner Drew Language Academy

- Certificate of Honor Roll "A/B" 2009
- Certificate of Honor Roll "A/B" 2008
- Certificate of Achievement JA 2009
- Certificate Global Marketplace 2008

Preschool

- Certificate of Fun – Spelling Bee 2002
- Certificate of Fun – Spelling Bee 2001

How do you amend a culture that was built upon "officer friendly;" where respect and help were clearly defined; and where the greatest memories were receiving coloring books from police officers? Have we painted a picture of a ghetto mentality; is our daughter the "hood rat" that some now say she is; and is she the "low class whore" that others are now professing she is? Peer pressure is a searing force. Worse is there nothing you can do about it. Character assassination is worse yet – you are left to live with it unabated and so surreal and it hurts.

Parents'
we pray

EXHIBIT 2

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Chicago Police Department - Incident Report

RD #: HV213479

SUSPECTS

RELATIONSHIP

(Victim)

is a No Relationship of

(Offender)

UNK FEMALE

(Victim)

is a No Relationship of

(Offender)

OFFENDER(S)-NO DETAILS

DOMESTIC INFO

OTHER

Miscellaneous

Victim Information Provided

Flash Message Sent ? No

NARRATIVE

EVENT 01389 IN SUMMARY, UPON ARRIVAL TO [REDACTED] HOSPITAL [REDACTED] (VICTIM) RELATED THAT AFTER A VERBAL ALTERCATION, THE UNKNOWN FEMALE OFFENDER SHOVED HER TO THE GROUND AND BEGAN HITTING HER ABOUT THE FACE A BODY WITH HER FISTS AND FEET. OTHER OFFENDERS THEN JOINED IN. [REDACTED] (VICTIM) DID NOT KNOW THE OFFENDER. [REDACTED] (VICTIM) IS EXPECTED TO BE TREATED AND RELEASED FOR HER INJURIES.

REPORTING OFFICER - STAR#: NAME: KENNEDY BEAT: 0434R

PERSONNEL

	Star No	Emp No	Name	User	Date	Unit	Beat
Approving Supervisor	1226	[REDACTED]	KAPA, Christoph, J	[REDACTED]	25 Mar 2012 05:17	004	
Detective/Investigator	21198	[REDACTED]	LAZZARA, Steven, J	[REDACTED]	26 Mar 2012 09:21	620	
Reporting Officer	16016	[REDACTED]	CHRISTENSEN, Amy, C	[REDACTED]	25 Mar 2012 03:08	004	0434R

CHICAGO POLICE DEPARTMENT

ORIGINAL CASE INCIDENT REPORT

3510 S. Michigan Avenue, Chicago, Illinois 60653
(For use by Chicago Police Department Personnel Only)
CPD-11.388(6/03)-C)

RD #: **HV213479**

EVENT #: **1208501389**

Case ID: **8536700 CASR229**

IUCR: 0460 - Battery - Simple

Occurrence 7901 S Sangamon St

Location: Chicago IL

299 - School, Private, Grounds

Occurrence Date: 24 March 2012 23:00

Beat: 0621

Unit Assigned: 0434R

RO Arrival Date: 25 March 2012 02:35

Offenders: 1

ARRR222



CHICAGO POLICE DEPARTMENT
 Bureau of Investigative Services / Youth Investigations Group
 3510 South Michigan Avenue/Chicago, IL 60653
INFORMAL STATION ADJUSTMENT



Page 1 of 1

CPD-24.137 (3/99)

Y#:	CB #: 18372433	RD #: HV213479	[] Override
Name : PIPHUS, JOANNA			
Sex : FEMALE		Race : BLACK	
DOB : 02-MAR-1997			
Address : 7624 S LAFAYETTE AVE CHICAGO IL 60620			
Phone : 7734830335			
Charges : BATTERY - CAUSE BODILY HARM			
[] MCC		[X] Misdemeanor	
[] Felony			
Override: Youth Div Supervisor :		ASA :	
Dist. Of Arrest : 002		Arresting Officer(s) : GROSS, KARYN / BROWN, DENNIS	
[] Miranda Warnings Administered		[] Previous History Attached	
Summary : M/R arrested for battery. Inf. Released to parent.			

Felony: Formal Adj: 0	Informal Adj: 0	MDM Formal Adj: 0	Informal Adj: 0	Total: 0
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SPECIFIC CONDITIONS HEREIN IMPOSED*Informal Adjustment Begins:**Informal Adjustment Terminates:*

If Minor refuses to or fails to abide by the conditions of this Informal Station Adjustment, the Youth Investigator may impose a Formal Station Adjustment or refer the matter to the State's Attorney's Office.

I understand and fully agree to the terms and conditions described above.

Signature of Minor: _____	Date: _____
Parent/Guardian: _____	Signature: _____
Address: _____	Phone: _____
Father: PIPHUS, WILLIAM	Address: 7624 S LAFAYETTE AVE CHICAGO IL 60620
Phone: 773-483-0335	
Mother: _____	Address: _____
Phone: _____	
Youth Investigator: _____	Unit: _____
Supervisor: _____	
Signature: _____	Signature: _____

Informal Station Adjustment Completed: [] Successfully [] Unsuccessfully **Date Adjustment Violated:** _____

Conditions Violated:

Youth Investigator: _____ **Unit:** _____ **Date:** _____

ARRR222



CHICAGO POLICE DEPARTMENT
Bureau of Investigative Services / Youth Investigations Group
3510 South Michigan Avenue/Chicago, IL 60653



Page 1 of 1

CPD-24.137 (3/99)

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		Informal Adj: 0	Total: 0
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Mother: _____	Address: _____	Phone: _____	
Youth Investigator: _____	Unit: _____	Supervisor: _____	
Signature: _____		Signature: _____	

Informal Station Adjustment Completed: **[] Successfully [] Unsuccessfully** Date Adjustment Violated: _____

Conditions Violated: _____

Youth Investigator: _____ Unit: _____ Date: _____